

**Massachusetts
AFCARS
Assessment Review
Report**

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Children's Bureau, Administration on Children, Youth and Families
and
Office of Information Services
Administration for Children and Families
U.S. Department of Health and Human Services**

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Executive Summary

From June 12 - 17, 2005, staff of the Children's Bureau, Administration for Children and Families (ACF) Region I, and the Office of Information Services (OIS) conducted an assessment review of Massachusetts' Adoption and Foster Care Analysis and Reporting System (AFCARS) data collection in FamilyNet. The AFCARS data used for the review was from the report period October 1, 2004 - March 31, 2005 (2005A).

Two major areas are evaluated as part of an AFCARS assessment review (AAR): the AFCARS general requirements and data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed on the basis of whether the State is meeting the AFCARS definitions for the information required, if the correct data are being entered and extracted, and the quality of the data submitted. Each of the 103 foster care and adoption data elements is rated on the basis of its compliance with the requirements in the AFCARS regulation, policy guidance, and technical bulletins. Information that is collected from each of the components of the review is combined to rate each data element. A scale of one (does not meet AFCARS standards) to four (fully meets AFCARS standards) is used to assign a factor to each element. The general information requirements are also assessed and rated separately using the same scale. A summary of the significant findings is included in the report, and detailed findings can be found in the "Detailed Findings" matrices for the foster care and adoption data elements, and the general requirements (Tab A). The minimum tasks that are required to correct the State's reporting of the AFCARS data are included in the AFCARS Improvement Plan (Tab B). The rating factors received by the State are:

General Requirements	Rating Factor
Foster Care/Adoption Population Standards	2
Technical Standards	4

Rating Factor	Foster Care (66 elements)	Adoption (37 elements)	Full Data Set (103 elements)
4	23 (35%)	22 (59%)	45 (44%)
3	22 (33%)	0	22 (21%)
2	21 (32%)	15 (41%)	36 (35%)
1	0	0	0

The State has technical corrections that must be made to the program code or to its system FamilyNet. As noted in the above table, the State is in full compliance with the adoption population standards and the technical standards. The State is not in full compliance with two foster care population standards. These are related to the State incorrectly reporting children that are still in the agency's responsibility for care and placement that have been placed back into their homes as discharged, including youth that are over the State's age of majority. The State must only report those youth over the age of 18 that are still receiving title IV-E funds.

The most significant finding is in the area of placements. The State indicated there are instances when a suitable foster home, or group home, are not immediately available when a child enters foster care. Consequently, the child may be placed in multiple foster homes for one night at a time. The staff acknowledged this was not acceptable practice and that the State is working to improve its ability to find suitable foster settings and to provide placement stability for a child. The staff also indicated that these placements are not reported in AFCARS because the State's understanding was that a child's placement in a location was to be at least 24 hours before it was to be included as a placement count in AFCARS. This is not an accurate interpretation of ACF policy and the State must include each of these placement settings and count them for AFCARS purposes. As noted in the policy clarification in the Child Welfare Policy Manual (CWPM), 1.2B.7 question #7, a placement is: "... the physical setting in which a child finds himself or herself.... A new placement setting results when the foster care setting changes, for example, when a child moves from one foster family home to another or to a group home or institution." The question and answer that the State was referring to is in regard to how to count *brief* absences from an on-going foster care setting.

Changes made to the system with regard to data entry will inevitably result in improved data accuracy and quality. The State's semi-annual data submission may, as a result, fail to meet the missing data standard. In order to ensure that the data are complete, the agency must require workers to enter the data and assess its validity prior to submitting it to the Administration for Children and Families (ACF). To do so, the State may utilize the management reports created by the agency, as well as the Data Quality Utility and the Frequency Utility issued by ACF. It is important that the AFCARS data accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments.

Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State must submit the Improvement Plan electronically to the ACF Regional Office, OIS, and my staff with estimated due dates for completing the tasks in the Improvement Plan.

The State should contact the ACF Regional Office once it has completed its AIP. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted after the system changes have been implemented. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions, based on the test cases, have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.

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BACKGROUND

The Children's Bureau is committed to assisting States collect reliable and accurate data from the Adoption and Foster Care Analysis and Reporting System (AFCARS). To this end, an AFCARS assessment review (AAR) process was developed. The State's information system is assessed against the AFCARS requirements in the Federal regulation and policy issuances. The AFCARS assessment review evaluates a State's information system's capability to collect, extract, and transmit the AFCARS data accurately to the Administration for Children and Families (ACF). A second focus of the AFCARS review is to assess the accuracy of the collection and documentation of information related to the foster care and/or adoption case of a child.

The review process goes beyond the edit checks that must be met by a State in order to pass the AFCARS compliance error standards. The review also ascertains the extent to which a State meets all of the AFCARS requirements and the quality of its data. Additionally, while the review is an assessment of the State agency's collection and reporting of AFCARS data, it is also an opportunity for Federal staff to provide substantive technical assistance to State agency staff. During the review, the Federal team identifies improvements to be made to the system and recommends changes to the program code used to extract the AFCARS data.

Each AAR consists of a thorough analysis of the State's system technical documentation for the collection, extraction and reporting of the AFCARS data. In addition to this review of documentation, the Federal AFCARS team reviews each data element with the State team to gain a better understanding of the State's child welfare practice and policy and State staff's understanding of the data elements. The data is also compared against a small, randomly selected number of hard copy case files. Through this exercise, the accuracy of the State's data conversion process and understanding of the information reported to AFCARS is tested.

RATING FACTORS

Two major areas are evaluated during an AFCARS assessment review: the AFCARS general requirements and the data elements. The general requirements include the population that is to be reported to AFCARS and the technical requirements for constructing a data file. The data elements are assessed to determine whether the State is meeting the AFCARS definitions for the information required, if the correct data is being entered and extracted, and the quality of the data submitted.

AFCARS data submissions are subject to a minimal number of edit checks, as listed in Appendix E of 45 CFR Part 1355. Based on these edit checks, substantial compliance can be determined for the timely submission of the data files, the timeliness of data entry of certain data elements and whether the data meets a 90% level of tolerance for missing data and internal consistency checks. However, "substantial" compliance does not mean a State has fully implemented the requirements in the regulations. This explains why a State formerly may have been penalty-free, but does not have accurate and reliable quality data. For example, data cannot be assessed to determine whether the State submitted the correct foster care population required by the regulations.

Information collected from each component of the assessment review is used to rate each data element. The general requirements are assessed and rated separately using the same scale. A scale of one (does not meet the AFCARS standards) to four (fully meets the AFCARS standards) is used to assign a rating factor. Below is a chart that lists the factors that were used for the analysis of the State's AFCARS.

RATING FACTOR	DEFINITION
1	<p>The AFCARS requirement(s) has not been implemented in the information system. For example:</p> <ul style="list-style-type: none"> • The State information system does not have the capability to collect the correct information (i.e., there is no data field on the screens). • There is no program logic to extract the data.
2	<p>The technical system requirements for AFCARS reporting do not fully meet the standards. For example:</p> <ul style="list-style-type: none"> • The State information system has the capability (screen) to collect the data, but the program logic is incorrect - - <ul style="list-style-type: none"> • The State uses defaults for blank information. • Information is coming from the wrong place on the system. • Information is located in the wrong place on the system, i.e., it should be in foster care screens, not adoption screens. • The system needs modification to encompass more conditions, e.g., disability information.
3	<p>The technical system requirements for AFCARS reporting are in place, but there are data entry problems affecting the quality of the data.</p> <ul style="list-style-type: none"> • The system functions as required, but-- <ul style="list-style-type: none"> • the data are underreported due to inconsistent data entry. • the data are not being entered and/or there are no supervisory controls for ensuring data entry.
4	<p>All of the AFCARS requirements have been met. The information system is functioning as required, and the information is being accurately collected and extracted.</p>

For data elements and general requirements that do not meet existing AFCARS standards (factors 1 through 3), the State is required to make the corrections identified by the review team. It is possible that the problem with a data element and data are due to both system issues and case worker data entry issues. In such instances, the element will be rated a "2" to denote the need for modification to the system logic. Once the corrections are made to the system, the data will be re-analyzed. If problems related to case worker training or data entry still exist, then a "3" will be assigned to the requirement. A rating factor of "4" (compliant) will not be given to the element until all system issues and/or data quality issues have been addressed.

When assessing the general requirements, all specifications must be met in order for the item to fully satisfy the requirement. If the issue is a programming logic problem, then a "2" will be

assigned. If it appears the problem is due to data entry, then a “3” will be assigned to the requirement.

Some data elements are directly related to each other. When this occurs, all related elements are given the same rating factor, because incorrect programming logic could affect the related data elements.

The State is required to make the changes to the information system and/or data entry in order to be compliant with the applicable requirements and standards. Since the AFCARS data are used for several significant activities at the Federal and State level, the State must implement the AFCARS Improvement Plan, under Tab B of this report, as a way to improve the quality of its data.

FINDINGS

This section provides the major findings resulting from the review of the State’s AFCARS data collection. Tab A provides detailed information on the findings for the general AFCARS requirements, each of the foster care and adoption data elements, and the case file review. The AFCARS data used for the review were from the report period October 1, 2004 - March 31, 2005.

As part of the post-site visit analysis, the State’s documents, the data, the case file review findings, and team member notes are assessed to make the final determination of findings. As a result, the original rating factors were modified from those given at the end of the on-site review. The findings matrix in Tab A reports the previous rating with a “strike-through” mark on it, and the new rating. The AFCARS Improvement Plan in Tab B contains the final rating factor.

In general, the overall finding of the AFCARS review reflects the need for improved data quality. The State has technical corrections, but most of these are minor corrections to the extraction code. There are a few areas that require more work to correct and these are detailed in the section “Data Elements – Technical Errors.”

One significant finding is in the area of placements. The State indicated there are instances when a suitable foster home, or group home, are not immediately available when a child enters foster care. Consequently, the child may be placed in multiple foster homes for one night at a time. The staff acknowledged this was not acceptable practice and that the State is working to improve its ability to find suitable foster settings and to provide placement stability for a child. The staff also indicated that these placements are not reported in AFCARS because the State’s understanding was that a child’s placement in a location was to be at least 24 hours before it was to be included as a placement count in AFCARS. This is not an accurate interpretation of ACF policy and the State must include each of these placement settings and count them for AFCARS purposes. As noted in the policy clarification in the Child Welfare Policy Manual (CWPM), 1.2B.7 question #7, a placement is: “... the physical setting in which a child finds himself or herself.... A new placement setting results when the foster care setting changes, for example, when a child moves from one foster family home to another or to a group home or institution.”

The question and answer that the State was referring to is in regard to how to count *brief* absences from an on-going foster care setting.

General Requirement Standards

The State was found to be in full compliance with the adoption population standards and the technical standards. The State is not in full compliance with two foster care population standards.

The AFCARS data are to include all children who are in the agency's responsibility for placement, care, or supervision that are on "trial home visits" (Child Welfare Policy Manual, Section 1.3, AFCARS Reporting Population). The State's program code that extracts the AFCARS data enters a discharge date and reason when a child returns home. The State explained this was done in order to ensure timely entry of the discharge date; thereby meeting the transaction date timeliness standard. However, in some instances judges may maintain the agency's placement and care responsibility of the child. The State needs to include children returned home for the full specified period of time, including extensions beyond six months, while the agency maintains responsibility for care and placement of the child.

The State is including in its AFCARS report youth over the age of 18 that should not be included. The State's age of majority is 18 and it claims title IV-E funds for individuals up to their 19th birthday, if the child meets the IV-E requirements. The State also provides foster care services for youth over the age of 18 (up to the age of 22) with State funds under a voluntary agreement with the child. However, for AFCARS purposes, once a non IV-E eligible youth reaches the age of majority he/she must no longer be included in the AFCARS population. In Massachusetts, only 18-year olds that have been placed by the State and are title IV-E eligible are to be included in the AFCARS report. Otherwise, all youth that are still in a placement as of their 18th birthday must be reported to AFCARS as discharged with a reason of "emancipation," unless there is another appropriate outcome reason.

Data Elements - Technical Errors

- Diagnosed disability information (Foster care element #10)

The State indicated that their practice/policy is for children to receive an initial basic exam by a doctor within seven days of entering foster care. Depending on the child's age and health condition, a more complete physical is scheduled.

Based on the frequency report and the case file review, there appears to be an underreporting of this information. Of the 16,086 records reported for the 2005A report period, 2,196 (14%) were "yes," 3,939 (24%) were "no," and 9,951 (62%) were reported as "not yet determined." Of the 54 records analyzed, there were 21 (38%) records with errors. Nine records had a response of "no" in AFCARS but the reviewer found applicable diagnosed conditions. In 12 records, the AFCARS response was "not yet determined." All of these children had been in care for more than a year and in eight records, the response should have been "yes."

One reason the numbers for “unable to determine” are so high is because the program code maps missing data to this field. The State must map missing data to blank.

The State’s system is designed to capture whether there is a medical/psychological condition, the type of condition, the start date, recovery date, and whether it is a diagnosed condition. If the option “diagnosed” is selected, then foster care element #10 is mapped to “yes.” Otherwise, the field is mapped to “no.” The State staff indicated modifications are planned for the collection of this data. The revised program code will also check for doctor visit dates. The State will need to evaluate this method further to ensure that once the evaluation reports are received from the medical personnel the data are entered and the record is updated. The State should consider a way to incorporate the question and the responses into an appropriate screen in the system. This would ensure that a response of “no” means “no.”

- Placement Information (Foster care elements #23, 24, and 41)

As noted above, the significant finding regarding placement data is in regard to the exclusion of one night placement stays. The State needs to ensure that these placements are entered into FamilyNet and are reported to AFCARS. There are 220 records missing information for the current placement setting (foster care element #41) and 196 records missing data for the date of the current placement setting (foster care element #23). If a child is in foster care there must be data representing a placement. Case workers must be instructed to enter the date and location for all living arrangements.

The State indicated there are instances where the child may run away after the agency is given responsibility for care and placement, but before the child is actually placed in a foster care setting (for example, the child may run away from the court room). In these instances, the agency would report the placement setting as runaway, record the date the child ran away, and the placement count would be zero.

The State staff indicated that they cannot exclude “respites” as a placement setting and, therefore, are included in AFCARS and in the placement count. Respite stays are not to be reported in AFCARS and the State must not include them as a placement setting or in the placement count. There are codes for “respite” in the program code and mapping forms. The State needs to look at whether the respite codes are used and if not used comment them out. The State should also evaluate whether these codes can be used to exclude respites as a placement setting and to exclude them from the date of placement and the number of placements.

Also, the State needs to modify the program code to not include children that have a first placement in a hospital or locked facility. The removal date and the placement date would be when/if the child is moved to a foster home or other setting.

The State indicated that some of their group homes are larger than 12 beds and all group homes are mapped to the AFCARS value “group home” regardless of the size of the home. The State must map group homes that house between seven and twelve children to “group home” and those with more than 12 beds to “institution.”

- Sources of Financial Support (foster care elements #59, #62 and #64)

Data is collected for AFCARS on whether title IV-E foster care maintenance, title IV-D child support, and Social Security Income (SSI) payments are made on behalf of the child during a six-month report period. The State is incorrectly reporting that a child is eligible for title IV-E and SSI and not that an actual payment was made on behalf of the child. The accurate reporting of the title IV-E information is important as this element serves as the basis for the sample drawn for the title IV-E foster care reviews.

In regard to child support payments, the State does not currently have an interface between FamilyNet and the child support information system. The State must complete this interface in order to be in compliance with the Statewide Automated Child Welfare Information System (SACWIS) requirements. In regard to reporting this data for AFCARS, the State is required to report it regardless of having an interface or not. Currently, the system will support the manual entry of the receipt of child support payments. However, the program code is not checking the correct field for existing payment information. The program code must be modified to check for this information and extract it for AFCARS reporting.

- Relationship between an adopted child and his/her adoptive parents (adoption elements #29 - 32)

For AFCARS purposes the State is to report all of the relationships that apply between the child and the adoptive parents (e.g., the adoptive parents are relatives and were foster parents). Currently, the State only reports one type of relationship.

The State is also including “fictive kin” in its definition of “relatives.” This is not correct. Only individuals that are related to the child by blood or marriage are to be included as relatives. The State must ensure that workers do not classify fictive kin as “relatives.”

Data Quality

Once the above elements are corrected the quality of the data will need to be assessed. In some instances, training regarding new fields or screens will have to be implemented. In addition to these elements, the quality of the data for an additional 22 foster care elements needs to improve. One way to address accuracy of the data is through additional training and supervisory oversight. The State needs to incorporate ongoing data quality assurance to ensure that the data are correct and consistent.

There are also issues that are probably related to data conversion. For the removal and placement information, most of the errors identified could be attributed to a lack of data entry when the State’s information system became operational. The State should encourage workers to clean up the removal and placement information on open cases in which there was a prior foster care history that occurred before use of the new information system.

CONCLUSION

There are technical issues that need to be addressed but many of these are minor. Some data quality issues will improve once the State makes the correction to report as discharged those youth that reach the age of majority and are not receiving title IV-E payments. The State has several issues that needs to be addressed, both from a practice perspective and a technology one, regarding placement stability for children in foster care. The AFCARS data must be able to accurately reflect the circumstances of children in foster care and under the agency's responsibility.

Since there are issues that will also impact the compliance of the State's SACWIS, the State needs to work closely with the ACF Regional Office and the Division of State Systems and provide timely updates to its Advance Planning Document.

Tab B contains the AFCARS Improvement Plan (AIP). The AIP contains the AFCARS data elements that do not meet the requirements in the Federal regulations. Each matrix contains a column that identifies the task(s), the date the task is to be completed, and one for comments. Within 30 calendar days after the receipt of this report and the attached AFCARS Improvement Plan, the State staff must submit the Improvement Plan electronically to the ACF Regional Office with estimated due dates for completing the tasks in the Improvement Plan. An electronic copy of the final matrices will be e-mailed to your staff. The State should provide electronic quarterly updates of its progress to Julie Munro in the ACF Regional Office and Angelina Palmiero in the Children's Bureau.

Additionally, the State's plan for implementing the changes to the system and for caseworker training must be included in the State's title IV-B Annual Progress and Services Report as part of the information required in 45 CFR 1357.15(t) and 45 CFR 1357.16(a)(5). Once the State has completed implementation of the AIP, notify the ACF Regional Office. The ACF Regional Office will then provide the State with a set of test case scenarios. These scenarios test the system by requiring the State to enter the information and extract the data, which is then compared to known answers for each scenario. Dates for the submission of the test data file will be arranged with the ACF Regional Office and the Office of Information Systems.

In order to assess the quality of the data, a frequency report will be generated on the data submitted as changes to the system and training are addressed and after all system changes and training are completed. Once ACF and the State agree that the quality of the data is acceptable, and all tasks and revisions based on the test cases have been completed, the State must submit the completed AIP to the ACF Regional Office. The State will receive a letter summarizing the final results of the review.

The ACF Regional Office will work with the State to determine if technical assistance is needed, and available, to implement the AFCARS Improvement Plan. The State may obtain technical assistance from the Children's Bureau's resource centers. To request technical assistance from the resource centers, contact your ACF Regional Office.